

Re: Designated Persons

From: Personal Info. [REDACTED]@clhia.ca
To: "Bilodeau, Richard" <richard.bilodeau@fin.gc.ca>
Cc: "Dussault, Manuel" <manuel.dussault@fin.gc.ca>, Personal Info. [REDACTED]@clhia.ca, Personal Info. [REDACTED]@clhia.ca
Date: Fri, 18 Feb 2022 13:24:27 +0000

That may be but Without the information that is being shared with other financial institutions I can't see how our companies are able to screen. Feel free to call me to discuss. Personal Info. [REDACTED]

Get for iOS

Personal Info. [REDACTED]

CLHIA

From: Bilodeau, Richard <Richard.Bilodeau@fin.gc.ca>
Sent: Friday, February 18, 2022 6:52:40 AM
To: Personal Info. [REDACTED]@clhia.ca
Cc: Manuel Dussault <manuel.dussault@fin.gc.ca>; Personal Info. [REDACTED]@clhia.ca;
Personal Info. [REDACTED]@clhia.ca
Subject: Re: Designated Persons

Good morning Personal Info. [REDACTED]. While it does not apply to life and related insurance products, that does not mean that insurers might not have other products that are captured by the Order.

Sent from my iPhone

On Feb 18, 2022, at 6:31 AM Personal Info. [REDACTED]@clhia.ca wrote:

Please see the response from the RCMP – they do not believe that the order applies to insurers. We'll be communicating that to members. Thanks.

Personal Info. [REDACTED]

Personal Info. [REDACTED]@clhia.ca



Canadian Life and Health
Insurance Association
World Exchange Plaza
100 Queen Street, Suite 750
Ottawa, Ontario K1P 1J9

From: Hughes, Kelley <Kelley.Hughes@rcmp-grc.gc.ca>
Sent: Thursday, February 17, 2022 11:04 PM
To: Personal Info. [REDACTED]@clhia.ca; Personal Info. [REDACTED]@canadalife.com>

Cc: [Personal Info.]@clhia.ca>

Subject: RE: Designated Persons

Good evening,

Despite the wording within the Order, which may be interpreted several ways, it is our understanding that it was not intended to apply to insurers outside of vehicle insurance. Based on the information, and advice received, it would not fall within the spirit of the Order to disclose information regarding designated persons to insurers which could cause potential unintended impacts.

Apologies for not being able to circle back on this sooner. If you have further questions please contact me.

Take care,
Kelley

Kelley Hughes (Cpl.)

Federal Policing Criminal Operations - Financial Crime (FPCO-FC) |
Opérations criminelles de la Police fédérale – Criminalité Financière (OCPF-CF)
Royal Canadian Mounted Police (RCMP) | Gendarmerie royale du Canada (GRC)
National Headquarters | Direction générale
Ottawa, ON
Phone/Tél [Personal Info.]
kelly.hughes@rcmp-grc.gc.ca

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From: [Personal Info.]@clhia.ca>

Sent: February 16, 2022 9:03 PM

To: [Personal Info.]@canadalife.com>; Hughes, Kelley

<Kelley.Hughes@rcmp-grc.gc.ca>

Cc: [Personal Info.]@clhia.ca>; Beaudoin, Denis <denis.beaudoin@rcmp-grc.gc.ca>

Subject: RE: Designated Persons

Thanks from me as well, Kelley.

From: [Personal Info.]@Canadalife.com>

Sent: February 16, 2022 8:05 PM

To: Hughes, Kelley <Kelley.Hughes@rcmp-grc.gc.ca>; [Personal Info.]@clhia.ca>

Cc: [Personal Info.]@clhia.ca>; Beaudoin, Denis <denis.beaudoin@rcmp-grc.gc.ca>

Subject: RE: Designated Persons

Kelley,

Thanks for the update – we understand the complexities.

Regards,

Perso
[redacted]

From: Hughes, Kelley <Kelley.Hughes@rcmp-grc.gc.ca>

Sent: February 16, 2022 7:41 PM

To: Personal Info. [redacted]@clhia.ca>

Cc: Personal Info. [redacted]@canadalife.com>; Personal Info. [redacted]@clhia.ca>;

Beaudoin, Denis <denis.beaudoin@rcmp-grc.gc.ca>

Subject: [EXT] RE: Designated Persons

Good evening,

Thank you for reaching out and for your patience as we continue to work through the logistics of sharing information that is both current and relevant with the various listed entities in the EEMO.

Following my conversation with Perso earlier today, several questions were raised relating to insurers on the application of the EEMO and appropriate disclosure. Although we want to share information as quickly as possible, we must also exercise caution being mindful as to the potential unintended impacts. As such, we're awaiting some legal advice before proceeding further.

The Director of NHQ Federal Policing Criminal Operations – Financial Crime (FPCO-FC) Supt. Denis Beaudoin is copied here. Thank you again for your patience as we navigate the complexities of the Order.

Kelley

Kelley Hughes

Federal Policing Criminal Operations - Financial Crime (FPCO-FC) |

Opérations criminelles de la Police fédérale – Criminalité Financière (OCPF-CF)

Royal Canadian Mounted Police (RCMP) | Gendarmerie royale du Canada (GRC)

National Headquarters | Direction générale

Ottawa, ON

kelly.hughes@rcmp-grc.gc.ca

Phone/Tél: Personal Info. [redacted]

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From: Personal Info. [redacted]@clhia.ca>

Sent: February 16, 2022 3:28 PM

To: Hughes, Kelley <Kelley.Hughes@rcmp-grc.gc.ca>

Cc: Personal Info. [redacted]@canadalife.com> Personal Info. [redacted]@clhia.ca>

Subject: RE: Designated Persons

Hi Kelley:

I'd like to introduce myself as the staff person responsible for AML-ATF. I echo Perso request regarding a list of designated persons. If you have some time (which is likely in short supply for

you right now), we would appreciate a short meeting to understand the tools that might be available for life insurers looking to be in compliance with the new regulation.

Regards,

Personal Info.

From: Personal Info. <[redacted]@Canadalife.com>

Sent: February 16, 2022 12:45 PM

To: kelly.hughes@rcmp-grc.gc.ca

Cc: Personal Info. <[redacted]@clhia.ca>

Subject: Designated Persons

Importance: High

Hi Kelley,

Hope you're well.

The CLHIA (Canada Life and Health Insurers Association) has a meeting at 2:30 with its AML Working Group to discuss the Emergency Economic Measures Order. I've copied the CLHIA's AML rep on this email.

I've been advised that the RCMP provided a list via BCPIO to the Banks from FPCOFC-OCFPCF@rcmp-grc.gc.ca

Wondering how to set up a formal line of secure comms with the RCMP to also get this list out to Life Insurers.

Please let me know – happy to hop on a call if that works better.

Thanks.

Pers.

Personal Info.

The Canada Life Assurance Company and Great-West Lifeco Inc.

Softphone: Personal Info.

Mobile: Personal Info.

Personal Info. <[\[redacted\]@canadalife.com](mailto:[redacted]@canadalife.com)>

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